

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION

TEXAS GUN RIGHTS, INC.,
NATIONAL ASSOCIATION FOR GUN RIGHTS INC.,

Plaintiffs,

v.

Case No. 2:23-cv-00019

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES,

Defendant.

DECLARATION OF HANNAH HILL

I, Hannah Hill, declare as follows based on my own personal knowledge:

1. I am the Director of Legal Affairs of the National Association for Gun Rights Inc. (NAGR). In this role, I am personally familiar with NAGR's operations, organization, and membership.

2. NAGR has members who can no longer lawfully possess a pistol with a stabilizing brace without first registering that the pistol is a "short-barreled rifle." One of these members is E.J., who owned a pistol with a stabilizing brace subject to the new rule. Instead of registering the firearm, E.J. disassembled the pistol with the stabilizing brace, thereby rendering it unusual as required by the new rule. Based on my own personal knowledge, other NAGR members are in the same position as E.J.

3. NAGR also has a member who would like to acquire, keep, possess, and transfer a pistol with a stabilizing brace. One of these members is Tyler Witzke, who

would like to purchase a stabilizing brace but now will not because he does not want to register under the new rule.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: 7-26-2023



Hannah Hill